

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL

In the Matter of)
)
Petition for Expedited Rulemaking of) RM 9101
LCI International Telecom Corp. and)
Competitive Telecommunications Association)
to Establish Technical Standards for)
Operations Support Systems)

RECEIVED
JUL 10 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF BELL ATLANTIC AND NYNEX¹

LCI seeks to impose requirements on the Bell companies and other incumbent local exchange carriers (ILECs) that would require ILECs to give preferential treatment to competing local exchange carriers (CLECs) compared to the service provided to their own customers, and that, in any event, are contrary to the requirements of the Telecommunications Act and the Commission's Local Interconnection Order.² As a result, LCI's Petition for Rulemaking should be denied.

Moreover, there is no need for the Commission to establish performance standards, reporting requirements, technical standards, and damages provisions with respect to the provision of access to operating support systems (OSS) by incumbent local exchange carriers to competing

¹ "Bell Atlantic" includes Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-West Virginia, Inc., and Bell Atlantic Communications, Inc. "NYNEX" includes New York Telephone Company and New England Telephone and Telegraph Company. Bell Atlantic and NYNEX are sometimes referred to collectively as "the Companies."

² Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, 11 FCC Rcd 15499 (1996) ("Local Interconnection Order").

0+12

local exchange carriers. Public Notice at 1. Industry groups that include CLECs and interexchange carriers, as well as ILECs, are developing technical guidelines for interfaces to ILEC operating support systems (OSS). Performance measurements, reporting requirements, and enforcement provisions are being negotiated between CLECs and ILECs, with arbitration by the states as necessary, as contemplated by the Act. As a result, the Commission should decline to institute a rulemaking.³

I. Industry Standards-Setting Organizations Are Developing Technical Guidelines For OSS Interfaces And The Commission Should Allow That Work To Continue.

Although LCI addresses the “desirability” of national technical standards for OSS interfaces, LCI Petition at 21-23, it has pointedly not asked the Commission to set such standards and the Commission should not initiate a rulemaking to do so.

As LCI notes, the groups sponsored by the Alliance for Telecommunications Industry Solutions (ATIS) and accredited by the American National Standards Institute (ANSI) “are well positioned to resolve which interfaces and formats are reasonably necessary and practical for each particular OSS function or sub-function and have made substantial progress.” LCI Petition at 22 (internal quotation marks omitted). Bell Atlantic and NYNEX are active participants in this process through ATIS and the Ordering and Billing Forum (OBF), and are working to implement the recommendations adopted to date.

³ The Commission has twice declined to condition the requirement to provide access to OSS functions on the creation of national standards and instead has decided to “monitor closely” the progress of industry organizations. Local Interconnection Order, ¶¶ 525-28; Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, 11 FCC Rcd 19738, ¶ 13 (Dec. 13, 1996) (“Second Reconsideration Order”).

If the Commission were to attempt to set technical standards by regulatory fiat, it would risk freezing technology in an area that is developing rapidly. As the Commission noted in its Interconnection Order, ATIS includes representatives of many segments of the telecommunications industry. Local Interconnection Order, ¶ 513, n. 1235. It is, therefore, an appropriate forum in which to address the varied and evolving needs of both CLECs and ILECs with respect to OSS interfaces. There has been no suggestion that ATIS, or any of the groups sponsored by it, will fail to develop appropriate standards or that development of such standards is being unduly delayed. As a result, the Commission should allow these groups to continue their work.

II. Performance Measurements, Reporting Requirements And Enforcement Provisions Should Be Negotiated Between Parties And Arbitrated, If Necessary, By The States.

LCI asks that the Commission require ILECs to disclose OSS performance standards they have established for themselves, set national performance standards for each OSS function (whether ILECs currently have performance standards in place or not), and establish “any related OSS requirements (e.g., appropriate beta testing to ensure operability and scalability)” that must be met by ILECs. LCI Petition at v, 87-88. LCI’s requests suffer from several fundamental flaws and the Commission should, therefore, decline them.⁴

A. LCI’s Request To Add A Term To The Competitive Checklist Is Prohibited By The Act And Should Be Rejected.

Despite an express statutory prohibition against expanding the terms of the competitive checklist, § 271(d)(4), LCI urges the Commission to add a new term to the checklist, and to

⁴ Whether OSS is, in fact, a “network element” subject to unbundling is an issue currently pending in the Eighth Circuit appeal of the Local Interconnection Order.

require that the Bell companies provide, at least in some circumstances, fully automated access to their operations support systems. LCI Petition at 17-19. This requirement has no basis in the statute.

On the contrary, while the Commission has concluded that incumbent carriers must provide non-discriminatory access to their existing operations support systems, it also has made it clear that they may do so in any way that allows competitors to provide service in "substantially the same time and manner" that the incumbent provides service to its own customers. Local Interconnection Order, ¶ 518.⁵ So long as a Bell company can demonstrate that it has processes in place that are reasonably designed to meet this standard, there simply is no rational reason to deny it long distance relief solely because its internal systems for processing orders (once they have been received from a competitor) may, in some instances, require a degree of manual intervention.

B. A Single National Performance Standard Would Be Meaningless At Best, And Would Ignore State-Specific Service Quality Requirements.

As the Commission has recognized, OSSs vary from carrier to carrier. Local Interconnection Order, ¶ 526; see also ¶523, n. 1273. As a result, a single national performance standard would not take into account the differences in underlying systems and would be meaningless at best.

⁵ The Commission found in August 1996 "that incumbent LECs . . . have made significant progress" in "modifying their networks to provide requesting carriers access to OSS functions." Local Interconnection Order, ¶ 525. Four months later, the FCC pointedly noted that it was "encouraged by reports that this progress has continued." Second Reconsideration Order, ¶ 10.

Moreover, carriers are subject to service quality standards set by individual state commissions. Accordingly, meaningful performance measurements and reporting requirements can best be achieved through negotiations between parties and, if necessary, arbitration by the states, as contemplated by the Act. 47 U.S.C. § 252. That process is already occurring. Bell Atlantic has signed interconnection agreements with several CLECs that require Bell Atlantic to report a variety of performance measurements for Bell Atlantic and its affiliates, the individual CLEC, all CLECs in the aggregate, and the top three interexchange carriers in the aggregate for each state in which the CLEC has operations. Bell Atlantic's Statements of Generally Available Terms and Conditions (SGATs) commit Bell Atlantic to providing such performance measurements to any CLEC that chooses to interconnect by adopting the SGAT, rather than negotiating an individual interconnection agreement.

In some instances, however, CLECs have requested additional performance reports above and beyond what Bell Atlantic has already agreed to. To the extent the parties have been unable to reach agreement, those disputes have been presented to the appropriate state commissions for arbitration. Similarly, NYNEX and a number of CLECs are engaged in proceedings in New York and in Massachusetts that are considering what performance measurements NYNEX should be required to provide to CLECs operating in those jurisdictions. This process of negotiation and state commission oversight ensures that performance reporting required of the ILECs will meet the reasonable needs of the CLECs, address particular characteristics of individual OSSs, and take into account relevant service quality standards of each individual state.

III. If The Commission Grants LCI's Petition, Which It Should Not, The Commission Should Provide Guidance That Will Allow The Process Of Negotiation And Arbitration Contemplated By The Act To Continue.

The foregoing demonstrates that LCI's request that the Commission institute a proceeding to establish national performance standards or measurements is inappropriate and should be denied. If the Commission were to grant LCI's Petition, however, which it should not, the Commission should establish guidelines that will allow parties and the states to continue to take into account their own needs, and the differences among systems and state regulations. For example, the Commission should make clear that the appropriate standard for OSS performance is one that will allow CLECs to "perform the functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing for network elements and resale services in substantially the same time and manner that an incumbent can for itself." Local Interconnection Order, ¶ 518 (emphasis supplied).

The Commission should not adopt performance standards modeled on the standards formulated by the Local Competition Users Group (LCUG), as LCI requests.⁶ Those standards do not provide for performance "in substantially the same time and manner" as what an ILEC does for itself, but instead seek special performance standards that provide preferential treatment to the CLECs. For example, LCUG states that "service orders should be filled within 24 hours." LCI Petition at i, 8; see Appendix B page 6. In many instances, Bell Atlantic and NYNEX do not fill service orders from their own customers in 24 hours, especially where facilities work is

⁶ The Commission's Public Notice focuses on access to OSS functions, but the LCUG document attached to LCI's Petition includes a number of areas that go well beyond OSS interfaces, such as network performance and handling of operator services and directory assistance calls. For the reasons discussed in these comments, the Commission should not expand the scope of its Public Notice to cover these areas.

required or a dispatch is needed. A national requirement that ILECs do so for CLECs, therefore, would give CLECs a preference over ILECs' own customers.

Moreover, in some instances, LCUG seeks to require ILECs to meet requirements that are impossibilities. For example, LCI states that ILECs must provide CLECs the ability to order unbundled network elements with "no disconnection or disruption of service." LCI Petition at 11. Although the Companies strive to keep the period as brief as possible, it is not possible physically to transfer an end user customer's loop from a Bell Atlantic or NYNEX switch to a CLEC's collocated transmission equipment without disrupting service for at least a short time.⁷

Finally, the LCUG standards would hold ILECs responsible for performance that is within the control of CLECs as well as ILECs. For example, LCUG proposes that ILECs be required to meet a standard for network blockage, LCI Petition, App. B at 14, but if the CLEC fails to install trunks ordered by the ILEC in a timely manner, or fails to provide adequate forecasts of expected traffic volumes, it is the CLEC that has caused network blockage to occur, not the ILEC. As a result, the Commission should not adopt performance standards modeled on the standards formulated by LCUG.

IV. LCI's Petition Misrepresents The Current Status Of OSS Interface Availability.

LCI spends over 60 per cent of its petition reciting a litany of alleged "failures" by individual ILECs to meet LCI's view of the OSS requirements. LCI Petition at 30-54. LCI admits that its discussion is outdated. LCI Petition at 34, note. Contrary to LCI's assertion, *id.*,

⁷ Bell Atlantic has committed that service disruption on a coordinated cutover will be 15 minutes or less per loop. In fact, the average cutover time per loop has been running less than five minutes. In most instances, if a CLEC is ordering an unbundled network element platform, service does not need to be disrupted.

however, many of the allegations were not accurate when made. Indeed, the “source documents,” which LCI regurgitates in its Petition, have been rebutted in the state proceedings where they were filed, and information correcting the false assertions contained in them has been provided on several occasions. For example, LCI quotes Mr. Morson’s claim that as of March 6, Bell Atlantic “was not yet able to provide even a demonstration of its pre-ordering interface.” LCI Petition at 71. At the time MCI filed Mr. Morson’s statement, however, Bell Atlantic had demonstrated the ECG screens at a reseller seminar in December attended by MCI. At a two and one-half-day workshop at the end of January, Bell Atlantic provided a live demonstration of ECG. MCI had three people at that workshop. At a March 6 meeting with MCI, Bell Atlantic representatives suggested that MCI visit Bell Atlantic’s facility to view a demonstration of ECG there, but also offered to meet with MCI at another time and place to provide a demonstration. Although the same Bell Atlantic employees had been in contact with MCI on at least four occasions over the following few weeks, MCI never asked for such a meeting. See Exhibit 1 at ¶¶ 38-41.⁸

Similarly, LCI repeats claims that the response time for NYNEX’s pre-ordering interface “exceeds one minute.” LCI Petition at 60. In fact, at the time those claims were made, NYNEX had brought its pre-ordering interface response time down to 11 seconds, and had notified all

⁸ Exhibit 1 is an excerpt from the Reply Declaration of Donald E. Albert, filed with the Pennsylvania Public Utility Commission on March 21, 1997, rebutting this Morson claim and others by Kirchberger, Morson, and Sywenki contained in the “source documents” quoted at pages 70-74 of LCI’s Petition. The specific claims against NYNEX recited in LCI’s Petition are similarly being addressed in state proceedings.


CLECs of the change.⁹ It is irresponsible, at best, for LCI to repeat these allegations. LCI's failure even to acknowledge the corrected information amounts to deliberate misrepresentation to this Commission of the status of OSS interface availability.

CONCLUSION

Industry groups are in the process of developing national technical standards for OSS interfaces. ILECs and CLECs are negotiating performance measurements and reporting requirements in their interconnection agreements and arbitrating disputes concerning such measurement and reporting where necessary. These are the appropriate forums for the development of such standards. As a result, the Commission should deny LCI's Petition to institute a rulemaking to establish national technical and performance standards for OSSs.

Respectfully submitted,

Of Counsel
Edward D. Young, III
Michael E. Glover


Leslie A. Vial
1320 North Court House Road
8th Floor
Arlington, VA 22201
(703) 974-2819

Attorney for Bell Atlantic

Jack M. Farris
1095 Avenue of the Americas
38th Floor
New York, NY 10036
(212) 395-6355

Attorney for NYNEX

July 10, 1997

⁹ See Affidavit of Stuart Miller, Petition of New York Telephone Company for Approval of its Statement of Generally Available Terms and Conditions, Case 97-C-0271 (NY PSC) (dated Apr. 27, 1997).

EXHIBIT 1

REPLY DECLARATION OF DONALD E. ALBERT

I, Donald E. Albert, declare as follows:

1. I am Network Director of Co-Carrier Implementation for Bell Atlantic Network Services, Inc. In that position, I am directly involved with network implementation of co-carrier, unbundling, and collocation arrangements throughout Bell Atlantic's seven jurisdictions. I am responsible for many of the network engineering and operational aspects of implementing the Telecommunications Act of 1996 and the Federal Communications Commission's orders in CC Docket No. 96-98 implementing Section 251 of the Act.

2. In my declaration dated February 10, 1997, I explained the activities Bell Atlantic-Pennsylvania, Inc. (BA-PA) has undertaken to comply with the competitive checklist set out in section 271(c)(2)(B) of the Telecommunications Act of 1996. This reply declaration will update that information. In addition, while I am unable to deal in detail with each and every problem and concern raised by other commentors,¹ I will address many of the issues that deal with our compliance with the competitive checklist requirements.

* * * * *

¹ In some cases, a detailed response could involve divulging CLEC proprietary data, which I have not done.

ACCESS TO OPERATIONS SUPPORT SYSTEMS

35. As I explained in my February 10 declaration, BA-PA will provide access to its operations support systems (OSS) as required by the FCC. AT&T and MCI, however, have an overly expansive view of what the FCC required. The FCC's interconnection order required that BA-PA and other LECs provide "nondiscriminatory access" to the OSS functions listed in paragraph 523. The order did not use the term "parity" in conjunction with access to OSS, and it did not require that all interfaces meet industry standards. *See* Kirchberger Decl. at 12; Morson Decl. at 8. The order also did not require "machine-to-machine" communications or even "electronic interfaces." Kirchberger Decl. at 12. Instead it says that where BA-PA uses electronic gateways to its OSS, it should provide the same kind of capability for CLECs. 251 Order, ¶ 523. BA-PA is making available electronic access to its OSS functions.

36. A number of commentators argue that the electronic interfaces BA-PA will provide must be tested before the Commission can be sure they are ready to support competition. *E.g.*, AT&T Comments at 10-13; Kirchberger Decl. at 8-11; Morson Decl. at 16-17; Smith Decl. at 7-8. Bell Atlantic has completed its internal testing of the initial electronic interfaces available for competing carriers to obtain access to BA-PA's OSS functions. (Of course, since we are continuing development work on, and improvement of, the electronic interfaces, we will continue to test in the future.) Moreover, in my declaration filed on February 10, I described the operational readiness test of the electronic interfaces to its OSS functions that Bell Atlantic was conducting with a randomly selected reseller. That test has been completed, and the results will be made available to competing carriers and to the Commission on March 28, 1997. In addition, since my declaration was filed, Bell Atlantic has signed testing agreements with five carriers and is close to signing testing agreements with several more. AT&T, MCI, Sprint, and

ATX are among the carriers with whom Bell Atlantic has signed agreements or is close to signing agreements. These agreements, which cover both resale and unbundled network elements, allow carriers to test the connectivity of their particular systems with Bell Atlantic's, and test the exchange of data over the interfaces. Bell Atlantic is willing to sign testing agreements with carriers even if they have not yet signed an interconnection agreement. Finally, as Mr. Smith notes in his declaration, Bell Atlantic is in discussions with Sprint concerning a "stress" test of BA-PA's OSS. Smith Decl. at 7. As a result, the Commission can be assured that BA-PA's OSS are being thoroughly tested.

37. A number of commentators argue that the electronic interfaces to BA-PA's OSS must provide "equivalence to the ILEC for information availability, equivalence of information accuracy, and equivalence of information timeliness." Smith Decl. at 5 (item numbers omitted). *See also, e.g.,* Kirchberger Decl. at 4. BA-PA's interfaces do so.

1. Pre-Ordering

38. The Electronic Communication Gateway ("ECG") gives competing carriers' customer service representatives access to the same systems that BA-PA's customer service representatives use for pre-ordering information.² When the information is updated, everyone with access to the systems -- both carrier service reps and BA-PA service reps -- will have access to the same updated information. In addition, the ECG will provide access to pre-ordering information supporting both resale and the purchase of unbundled network elements. Therefore, ECG provides equivalence of information availability, accuracy, and timeliness.

² MCI complains that the information BA-PA makes available for pre-ordering is incomplete. Morson Decl. at 19. However, this is the first time in any of our dealings with MCI that it has mentioned the four additional "sub-functions" it lists there. Indeed, BA-PA is not even sure what all of the listed functions mean. To the extent we have been able to guess at what Mr. Morson is referring to, however, they are not pre-ordering functions.

39. Mr. Morson claims that as of March 6, BA-PA "was not yet able to provide even a demonstration of its pre-ordering interface." Morson Decl. at 16-17, 23. Mr. Morson is misinformed. Bell Atlantic demonstrated the ECG screens at a reseller seminar in December that MCI attended. At a two and one-half-day workshop at the end of January, Bell Atlantic provided a live demonstration of ECG. MCI had three people at that workshop. At a March 6 meeting with MCI, Bell Atlantic representatives suggested that MCI visit our facility to view a demonstration of ECG there, but also offered to meet with MCI at another time and place to provide a demonstration. Although the same Bell Atlantic employees have been in contact with MCI on at least four occasions since then, MCI has never asked for such a meeting.

40. Mr. Morson is also wrong when he states that MCI has not seen "any detailed description of ECG." Morson at 22, n. 4. A detailed description of ECG was provided at the workshop in January. In addition, Bell Atlantic's reseller handbooks, which are available over the Internet, contain detailed information about ECG and its use for local service pre-ordering.

41. Finally, Mr. Morson claims that MCI's experience with ECG for access is "limited." In fact, MCI was Bell Atlantic's test partner in developing ECG for access services and has used it since 1993. Last month, our ECG interface for access services received over 5,300 transactions or inquiries from MCI.

2. Ordering and Provisioning

42. BA-PA is using Electronic Data Interface ("EDI") to provide an electronic interface to its ordering systems. BA-PA is currently using version 6.0 and will upgrade to version 7.0 in the near future. Competing carriers' customer orders will be processed with the same service intervals as comparable BA-PA customer orders. Moreover, competing carriers' orders are handled through BA-

PA's provisioning systems and processes the same way BA-PA orders are. As I explained in my February 10 declaration, Bell Atlantic is developing and implementing a system that will mechanically flow LSRs submitted through EDI into our service order processing systems. Although AT&T agreed to the LSR industry standard, they are now refusing to submit orders that conform to Bell Atlantic's "business rules." As a result, Bell Atlantic's ability to handle their orders mechanically will be impeded.

43. MCI complains that Bell Atlantic has not stated that it will use industry standards for the firm order confirmation (FOC) that is returned to CLECs when an order is accepted. Morson Decl. at 18. BA-PA will return a FOC to CLECs in the same manner the CLEC submits an order. To the extent CLECs submit orders via EDI, the FOC returned to CLECs via EDI will meet industry standards.

44. MCI also argues that Bell Atlantic "should be expected to implement the recently approved OBF and TCIF industry standard EDI Feature Code Listing" for the codes used to order Bell Atlantic services, known as USOCs. Morson at 27. *See also* Morson at 18. These standard USOCs are simply not complete enough or robust enough to allow CLECs to order our services. At present, they only cover about 10% of BA-PA's products. As a result, Bell Atlantic has determined that we should continue using our existing USOCs. Bell Atlantic has no "database" of USOC codes, but we have provided MCI with all of our USOCs, together with the English service description, on diskette, allowing them to create their own database.

3. Maintenance and Repair; Billing

45. For maintenance and trouble reporting, BA-PA is replicating the access that its own employees have. When a competing carrier's employee submits a trouble report electronically, it flows into the same systems as BA-PA employee reports do, and is handled in the same manner as troubles

reported on BA-PA customer lines. Competing carriers will have a choice of using the ECG interface or OSI electronic bonding to report troubles for resold lines or with respect to unbundled network elements.

46. MCI complains that BA-PA has not committed to provide monthly summary bills in CABS BOS format. Morson Decl. at 36. BA-PA will send CLECs their usage in Exchange Message Records (EMR) format, which is consistent with national industry standards. The billing data BA-PA provides electronically, or via tape, to CLECs will also be in Bellcore standard record format. BA-PA is working to accommodate requests for bills in CABS BOS format, but that issue has nothing to do with whether BA-PA has met the requirements of the Act or the Order. In any event, MCI is already litigating this very claim in the MFS Phase III proceeding, and a decision is expected in mid-April.

4. Equivalence of Access

47. Although BA-PA is providing equivalence of information availability, accuracy, and timeliness to competing carriers, as shown above, several commentators complained about specific aspects of the access to OSS BA-PA is providing. For example, AT&T complains that a firm order confirmation or order rejection will not be returned while the competing carrier's service representative is on-line with the customer, that EDI accepts orders in "batches" every 30 minutes, and that the DUF will not be available for three days. Kirchberger Decl. at 16. As I noted above, BA-PA does not create or use the DUF for itself; it is a new service. While Bell Atlantic is working to determine whether the interval can be decreased, it currently takes three days to collect and return DUF information after the usage has been incurred on a line.

48. With respect to AT&T's other two complaints, the access provided to AT&T is equivalent to that which BA-PA service reps experience -- they do not receive order rejections or confirmations until after they have completely input the order into the service order processing systems,

which is usually well after they have completed the call with the customer. Moreover, the "batching" of orders will not affect BA-PA's requirement to process AT&T orders by the negotiated date due.

49. MCI complains that BA-PA's jeopardy notification process requires an additional step if a CLEC is involved, Morson Decl. at 31, and that CLECs' access to LMOS (one trouble administration system used by BA-PA) through the OSI interface is inferior to the access BA-PA employees have, Morson Decl. at 33. MCI's complaints are without merit. If a technician handling a BA-PA order runs into a jeopardy situation, he or she calls back to the BA-PA customer contact personnel, who then call the customer. If a technician handling a CLEC order runs into a jeopardy situation, he or she calls back to the CLEC Sales and Support Center (CSSC), who then call the CLEC. In this instance, the CLEC is BA-PA's customer, and the CLECs have asked that they be the single point of contact with their end user customers; they do not want BA-PA to contact their end users directly. At the current time there is no industry standard for mechanized jeopardy notification; Bell Atlantic is participating in OBF's efforts to develop standards and, as I discuss below, will probably implement such a standard when developed.

50. With respect to MCI's complaint about LMOS, MCI and BA-PA employees are treated just the same. If a BA-PA employee inputs more information than LMOS can capture, the additional information is printed out for the technician. If an MCI employee using the OSS interface inputs more information than LMOS can capture, the same thing will happen -- the additional information will be printed out for the technician. As a result there is equivalence between BA-PA and the CLECs.

5. Industry Standards

51. A constant theme of MCI's is the need for BA-PA to adhere to industry standards. *E.g.*, Morson at 7-10, 18, 21-22. Bell Atlantic has designed its interfaces to meet industry standards where such standards are available. For example, the EDI ordering interface is designed to accept LSRs (local

service requests -- the industry standard developed by OBF) in spite of the fact that the three different internal Bell Atlantic systems the orders must be put into are not standard. OBF has developed standards for the LSR for resale and for unbundled loops. As ordering standards for additional unbundled elements are developed, Bell Atlantic will support these standards across its EDI interface.

52. On the other hand, there is currently no industry standard for pre-ordering. In that case, according to Mr. Morson, Bell Atlantic should "adopt the least costly interim solution that would give requesting carriers the same level of access to the BOC's OSS functions as the BOC itself enjoys." Morson at 8-9. Bell Atlantic has done so. The ECG interface BA-PA uses for pre-ordering functions is the same ECG that already is in use by MCI and other IXCs in the access world. Bell Atlantic has provided the specifications necessary to operate ECG in the local exchange context, and there is nothing additional MCI needs to buy to interface with BA-PA's pre-ordering systems.


53. MCI argues that a BOC should not be deemed to have met the checklist unless "(1) [w]herever there exists an existing industry standard, the BOC [has] adopted and implemented it; and (2) wherever an industry standard does not yet exist, the BOC . . . enter[s] into a binding contractual commitment (backed up by adequate contractual guarantees and regulatory penalties) to comply with industry standards as soon as possible." Morson at 9. Such a requirement is completely inappropriate. First, as I noted above, while the FCC supports the development of industry standards, its order does not require that interfaces conform to industry standards. Moreover, mindless adoption of every industry standard would be detrimental both to BA-PA and to the CLECs. A good example is the USOC issue discussed above. If BA-PA had adopted that standard, CLECs would have been unable to order about 90% of our products.

6. Training for CLECs

54. Finally, MCI argues that BA-PA must provide training for CLECs on its OSS interfaces. Morson Decl. at 12. Bell Atlantic has six handbooks available for resellers, which may be obtained through the Internet. Bell Atlantic has also conducted seminars and workshops for resellers, providing hands-on training on interfaces and extensive descriptions of BA-PA end-user services. Finally, Bell Atlantic provides on-site training for CLECs whether they are reselling BA-PA services or buying unbundled network elements.

* * * * *

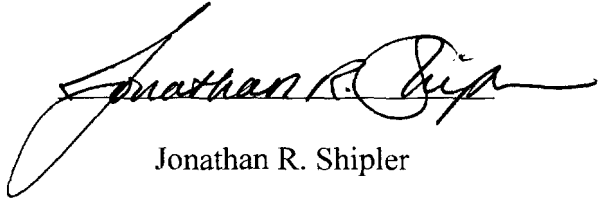
I verify that the foregoing is true and correct to the best of my knowledge and belief. This statement is made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

A handwritten signature in black ink, reading "Donald E. Albert". The signature is written in a cursive style with a large initial "D" and "A".

Donald E. Albert

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of July, 1997, a copy of the foregoing "Comments of Bell Atlantic and NYNEX" was served by first class U.S. mail to the parties on the attached list.

A handwritten signature in black ink, appearing to read "Jonathan R. Shipler", with a large, stylized flourish at the end.

Jonathan R. Shipler

* BY HAND

Janice M. Myles *
Common Carrier Division
Federal Communications Commission
1919 M Street, N.W.
Room 544
Washington, DC 20554

ITS, Inc.*
1919 M Street, N.W.
Room 246
Washington, DC 20554

Anne K. Bingaman
Douglas W. Kinkoph
LCI International Telecom Corp.
8180 Greensboro Drive, #800
McLean, VA 22102

Genevieve Morelli
CompTel
1900 M Street, N.W.
Washington, DC 20036

Eugene D. Cohen
Bailey Campbell PLC
649 North Second Avenue
Phoenix, AZ 85003-1518

Rocky Unruh
Morgenstein & Jubelirer
Spear Street Tower
San Francisco, CA 94105